



BOSTON & MAINE CORPORATION  
MAINE CENTRAL RAILROAD COMPANY  
SPRINGFIELD TERMINAL RAILWAY COMPANY

IRON HORSE PARK  
NO. BILLERICA, MASS. 01862

**LAW DEPARTMENT**  
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September 30, 2005

United States Department of Environmental Protection Agency  
New England Region  
Office of Ecosystem Protection  
One Congress Street, Suite 1100  
Boston, MA 02114-2023  
Attn: Michele Barden (CMP)

**Re: Supplemental Request for Information Pursuant to the Clean Water Act**

Dear Ms. Barden,

I am writing in response to EPA's request for additional information from the Boston & Maine Corporation (B&M) regarding the oil/water separator located in Somerville, Massachusetts. As outlined in Robert Culliford's letter of August 6, 2004 (the "August letter"), B&M does not have any obligation to respond as it has not been established that B&M is an owner or operator of a point source discharge as is required in 33 U.S.C. § 1318(a). However, while reserving its legal and equitable rights and remedies, B&M voluntarily provides the following information:

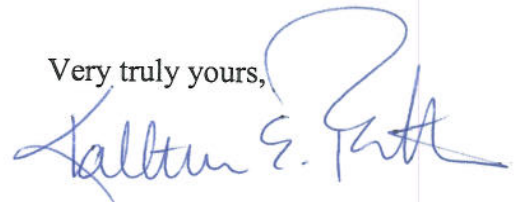
1. Attached as Exhibit "A" please find two (2) plans entitled "Millers River Interceptor Chamber, Boston, Mass." One plan is dated August 12, 1965 and the other is dated May 1, 1968. A diligent search of B&M records was conducted, but no further plans were uncovered. Additionally, it is important to note, as detailed in the August letter, the MBTA controls and operates the oil/water separator system on B&M property and would likely have plans showing further modifications.
2. See attached Exhibit "B."
3. A diligent search of B&M's records failed to disclose any plans reflecting changes to the facility. Again, the MBTA controls and operates the oil/water separator system on B&M property and would likely have any plans showing further modifications. Additionally, the MBTA engaged Amtrak to perform

commuter operations in 1986; therefore Amtrak may also have plans reflecting further modifications.

4. A diligent search of B&M's records failed to disclose any agreements between the Metropolitan District Commission ("MDC") and/or the Commonwealth of Massachusetts regarding the MDC pump station.
- 5./6./7. There are neither areas that contribute surface water runoff nor drainage structures that contribute to the oil-water separator on B&M property. Further, there are no changes planned to B&M property, which would cause either surface water runoff or drainage structures to drain into the oil/water separator.

Should you have any further questions or comments or require additional information, please contact Robert Culliford.

Very truly yours,



Katherine E. Potter

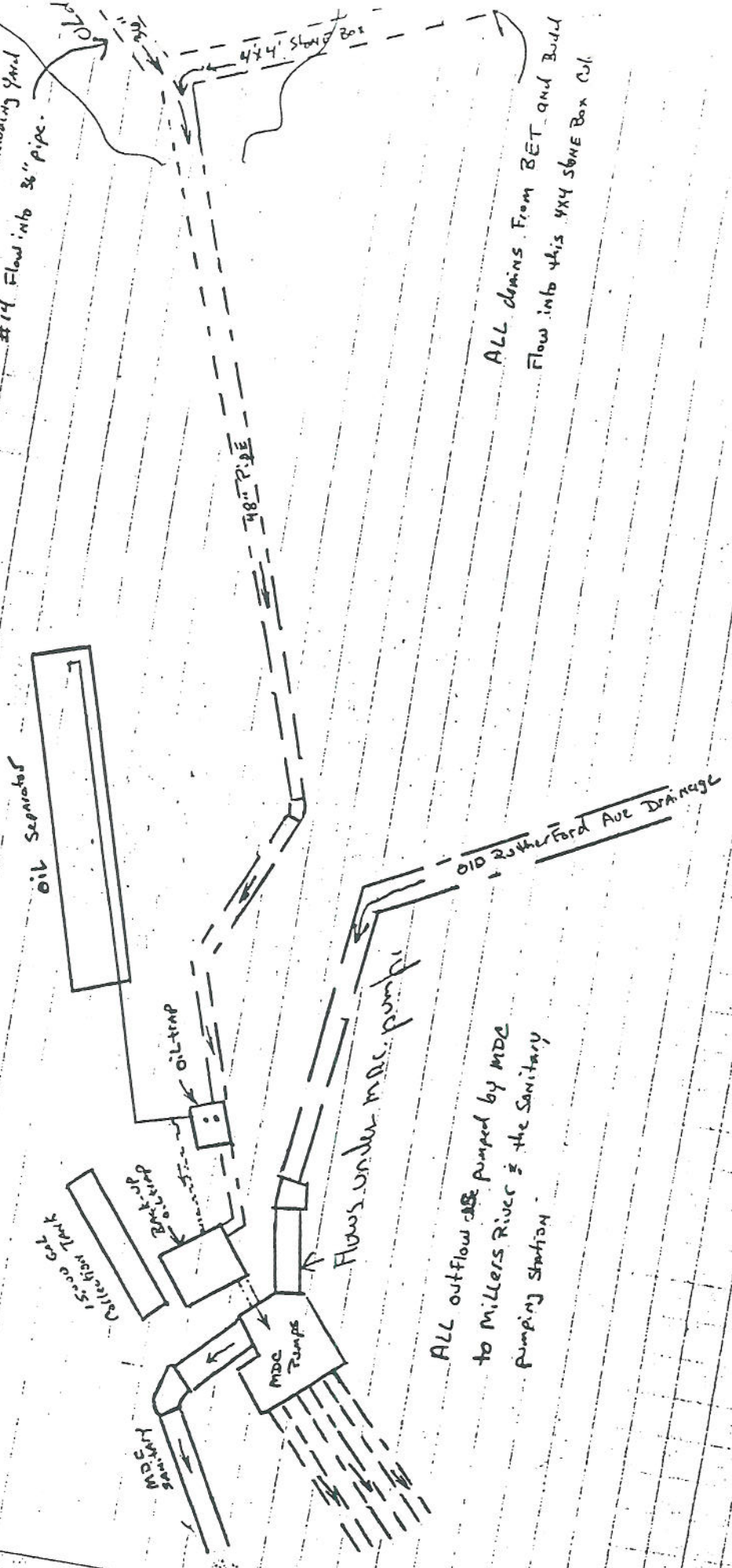
Enclosures

## EXHIBIT A

ALL Drains From Fitchburg M.L.  
and coach house including yard  
#14 Flow into 36" pipe.

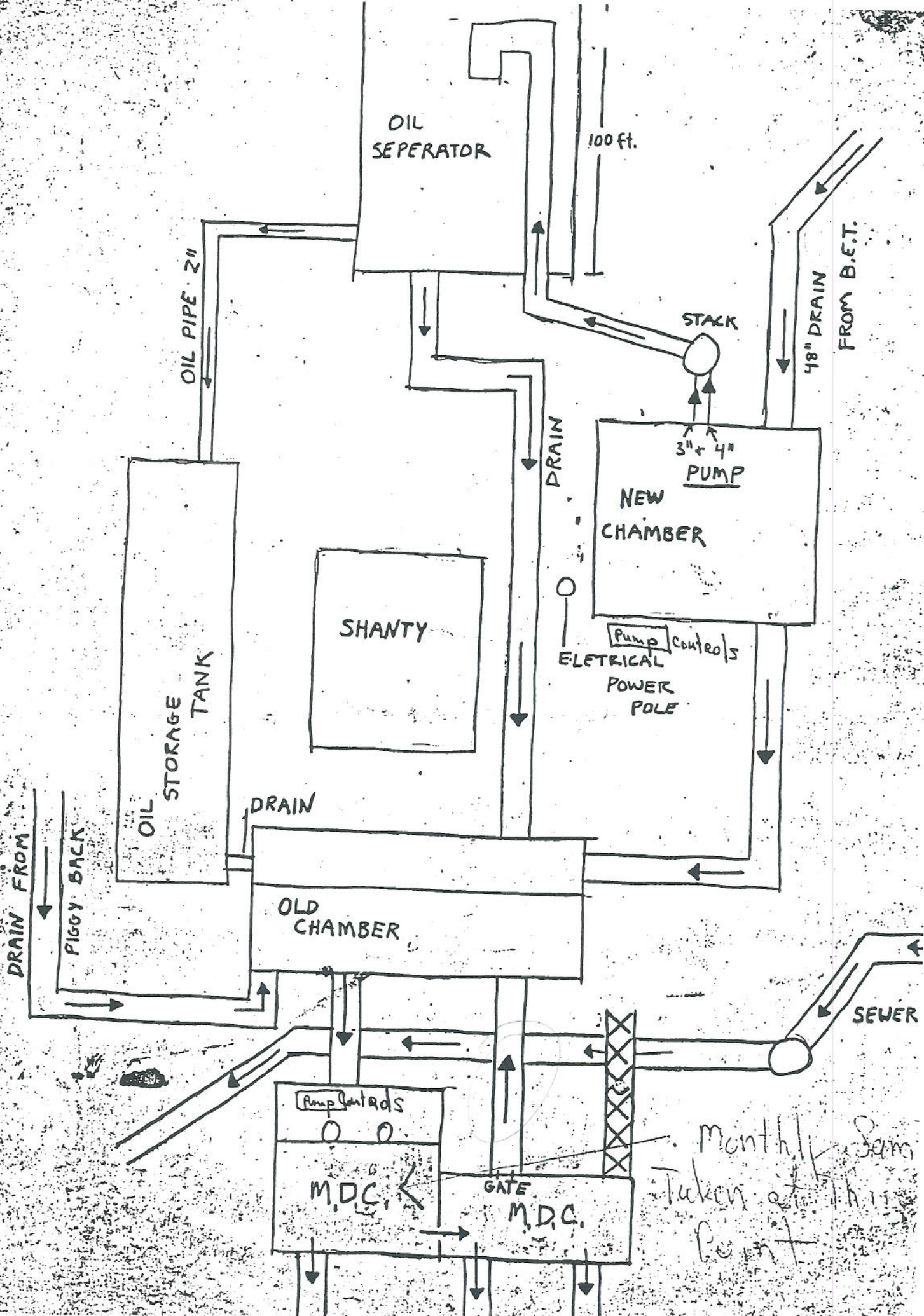
ALL drains From BET and Budd  
Flow into this 4x4 stone Box Cul.

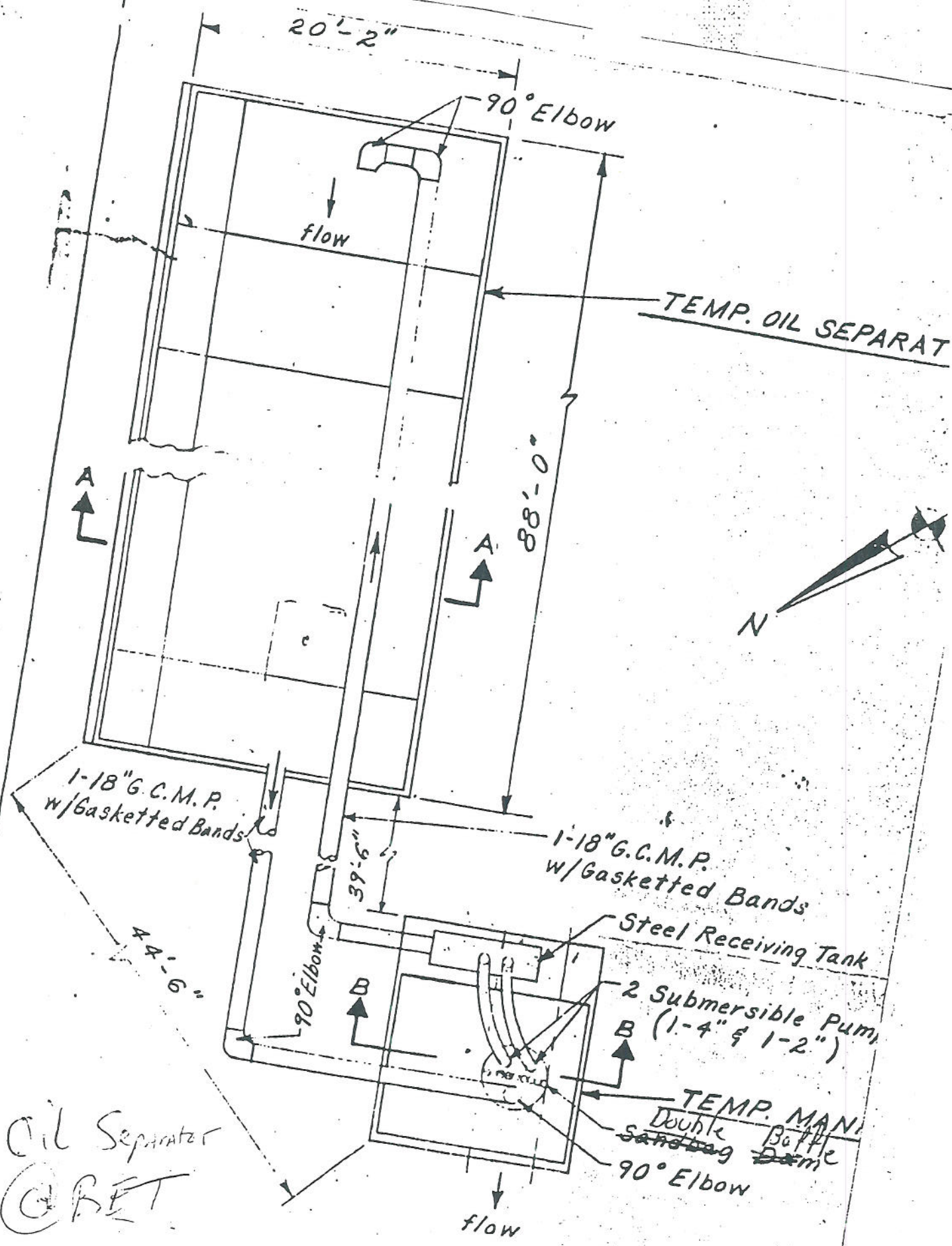
OIL Recovery B.E.T.  
PAUL W. KENNEDY



ALL outflow is pumped by MDC  
to Millers River & the Sanitary  
Pumping Station.







Oil Separator  
- CRET

## EXHIBIT B



- 1928 The Boston and Maine Railroad secured permits to fill a portion of Boston Harbor at its confluence with the Charles River.
- 1930 36" pipe installed in Millers River to carry drainage from Boston Engine Terminal also there was a 4' stone box culvert installed to carry drainage from North Somerville Station and the railroad right of way to the BET .
- 1928-1950 The railroad progressed with the filling operations leaving behind one small section of the Millers River. The reason was the Squires Meat Packaging Company depended on this for their meat processing this practice continued until the late 1950's
- 1960's After an unsuccessful attempt by Boston and Maine to construct the oil/water separator the contract was given to Perini Corp who were successful in constructing the separator to the dimensions of 16' X 16' X 25' deep.
- 1976 The MBTA acquired from the Boston and Maine those lines and facilities which were needed to operate their Commuter Rail Operations.
- 1975-1977 The MDC Marginal Sewer Project. Connecting into the oil/water separator to protect the Boston Engine Terminal's drainage system.
- 1982 The MBTA's 1,000,000 gallon storage tank was found to have a leaky floor.
- 1983 The Boston and Maine under contract with MBTA reduced the number of fueling stations from 9 to 4
- 1984 The MBTA gave approval for new automatic shut off valves.
- 1987 The Boston and Maine gave up the Operating Contract for MBTA's Commuter Rail Operations. The contract was given to Amtrak